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CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Christopher T. Penny
Project Coordinator
Installation Restoration Section (South)
Environmental Program Branch
Environmental Division,
Atlantic Division (LANTDIV), Code 182
Naval Facilities Engineering Command
1510 Gilbert Street
Norfolk, VA 23511-2699

Re: Atlantic Fleet Weapons Training Facility (AFWTF) - EPA I.D.# PRD980536221
Community Relations Work Plan Submitted pursuant to RCRA 3008(h) Order on
Consent

Dear Mr. Penny:

The United States Environmental Protection Agency (EPA) Region II has completed its review of the Community Relations Work Plan (CRWP) transmitted on January 28, 2002 on behalf of the Navy by CH2MHILL, as well as your letter of February 6, 2002 addressed to Mr. George Pavlou of EPA, in response to his November 7, 2001 letter on the draft CRWP. The CRWP was submitted pursuant to the January 2000 RCRA 3008(h) Administrative Order on Consent (AOC) addressing corrective action at non-range areas of the AFWTF facility (which pursuant to 40 C.F.R. § 260.10 also includes the Eastern Maneuver Area and Camp Garcia). This letter is addressed to you as the Navy's designated Project Coordinator, pursuant to Section IX of the Order.

EPA's Role in the Public Participation Process

As you know, the Agency is committed to actively participate in the Public Participation process for AFWTF. The January 2002 CRWP reflects EPA's involvement. As described in the CRWP, EPA will be the lead agency for Public Noticing the RFI work plan and related documents. EPA will be the lead agency for receiving, and responding to public comments, as necessary. If a public availability session is warranted, EPA will also be the lead agency for holding such a session. The Agency acknowledges the Navy's commitment to support these efforts as set forth in the CRWP.

In addition, as discussed in the submitted CRWP, following the Agency's approval of the Corrective Measure Study (CMS) Final Report developed by the Navy, EPA will prepare the Statement of Basis to select the proposed final remedial action(s). EPA will also arrange for Public Noticing the Statement of Basis and the CMS Final Report. EPA will be the lead agency for holding a public meeting, and for receiving and responding to public comments during the public comment period on those documents.

As you know, the Navy has proposed to modify the AOC to include possible requirements for a baseline groundwater investigation and a semi-annual groundwater monitoring program as part of a delay of closure of the open burning/open detonation (OB/OD) areas at AFWTF, as required under 40 C.F.R. Part 265 Subpart G. Should the AOC be expanded to address such closure activities, EPA would be the lead agency for public noticing and public comment on those activities as well.

Finally, as described in Section 2.3.2 of the CRWP, EPA will participate with the Navy, in all community interviews. EPA recognizes the importance of participating in the interviews first hand and values the opportunity to hear from involved parties face-to-face. However, the Navy will have primary responsibility for coordinating such interviews.

Comments on CRWP and Completeness of Other Documents

EPA finds the January 2002 CRWP to be complete, except for a few items, most of which (except for #1) are minor. These are detailed in the enclosure to this letter. EPA will accept the CRWP if the Navy submits, within 21 days of your receipt of this letter, revised pages and figures to acceptably address the enclosed comments. In addition, with this conditional acceptance of the CRWP, the documents previously submitted to EPA on September 5, 2001 by CH2MHILL on behalf of the Navy are hereby determined to be complete. These include the: RFI Master Work plan; RFI Site Specific Work Plan; Work Plan for [Supplemental] Groundwater Baseline Investigation; and Work Plan for Soil and Groundwater Background Investigation. Please submit two (2) additional copies of each of the above, within 21 days of your receipt of this letter, to Mr. Tim Gordon of my staff.

As previously indicated in my letter of April 10, 2001 to you, the February 19, 2001 Description of Current Conditions Report is acceptable. Therefore, pending EPA's receipt and review of the revised pages and figures to address the above comments on the CRWP, all other documents to be included with the public review of the RFI work plans are now complete. In anticipation of EPA's acceptance of the CRWP, please be prepared to promptly mail the revised Fact Sheet (Appendix C of the CRWP) to all parties listed in Appendix B of the CRWP, when advised by EPA.

Please telephone Mr. Tim Gordon of my staff at (212) 637- 4167 if you have questions regarding any of the above.

Sincerely yours,

Raymond Basso
Chief, RCRA Programs Branch

Enclosure

cc: Captain John R. Warnecke, Naval Station Roosevelt Roads, w/o Encl.
Mr. Carmelo Vasquez, PREQB, w. Encl.
Mr. E. Donald Elliott, Esq., Paul, Hastings, Janofsky & Walker, w. Encl.
Ms. Madeline Rivera, NAVSTA Roosevelt Roads, w. Encl.
Mr. John Tomik, CH2M Hill, w. Encl.
Ms. Connie Crossley, Booz Allen, w. Encl.

bcc: Carl A. Soderberg, 2CEPD, w. Encl.
William Muszynski, 2ARA, w/o Encl.
Bonnie Bellow, 2CD, w/o Encl
Kathleen Callahan, 2DEPP, w/o Encl
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Gary Nurkin, 2ORC, w/o Encl
Daniel Rodriguez, 2CEPD, w. Encl.
Nicoletta DiForte, 2DEPP-RPB, w. Encl.
Tim Gordon, 2DEPP- RPB, w. Encl.
RCRA File Room, w. Encl.

Enclosure 1
Comments on January 2002 Community Relations Work Plan

1. page 2-4 ["Technical Review Committee" (TRC)] and page 2-6, Section 2.4.2, fourth "bullet":

It is stated on page 2-4, that "[The] TRC was established to enhance public participation in the [Navy-lead] CERCLA remedial investigations of the Navy's former property on the western side of the island." In light of the specific geographic focus, differing regulatory/lead agency frame-works (Navy lead-agency and CERCLA regulatory frame-work versus EPA lead and RCRA frame-work at AFWTF), and different ownership/future usage scenarios (non-Navy ownership and future usage, versus Navy ownership and usage at AFWTF), EPA feels that a separate TCR for AFWTF (including the Eastern Maneuver Area and Camp Garcia), or alternatively a separate subsection of the existing TRC, should be formed to encompass activities under the RCRA AOC.

Furthermore, should the AOC eventually be expanded to address 40 C.F.R. Part 265 Closure activities for the open burn/open detonation (OB/OD) areas at AFWTF, as proposed by Captain John Warnecke's letter of October 26, 2001 to Mr. Pavlou, those activities would likewise be better handled under a separate TRC for AFWTF, or a separate subsection of the existing TRC.

2. page 2-6, Section 2.4.2, second "bullet": Change CH2MHILL to the Navy's Contractor (CH2MHILL).
3. page 2-7, Section 2.4.3, third paragraph: after RFI Final Report and CMS Final Report change "(or a summary)" to read (**and** a summary).
4. page 2-7, Section 2.4.4, last sentence: revise last sentence to state "...bilingual **translators and** stenographers..."
5. page C-2 of Appendix C (Fact Sheet) second paragraph, last sentence: change Open Disposal to Open **Detonation**,
6. page C-3 of Appendix C (Fact Sheet) next to last paragraph: take out e between and - made in last sentence.
7. Figure 2 of Appendix C (Fact Sheet), which was missing from your submittal, must be included.